

**Submission by Monaghan County Council in
Response to the Draft National Planning
Framework**

November 2017



1.0 Introduction

- 1.1 This submission has been prepared to provide comments from Monaghan County Council in respect of the draft National Planning Framework.

2.0 General Comments

- 2.1 The five Key Elements set out in Ireland 2040 are welcomed and concurred with, particularly in respect of more balanced growth between Ireland's three regions, the building up and strengthening of existing urban areas, and addressing rural decline. **Monaghan County Council considers that the National Planning Framework needs to be more explicit in how these key elements will be achieved and would request that measures to achieve them are clearly outlined within the final version of the National Planning Framework. Monaghan County Council would also request that specific funding for infrastructure provision to strengthen the capacity of towns is committed to the final version of the National Planning Framework.**
- 2.2 It is stated in Chapter One that one of the eight values of the Vision for Ireland 2040 is 'Opportunity', and that in spatial terms opportunity means maximising opportunities for all our communities and regions to develop further, irrespective of location. This is strongly concurred with and the delivery of opportunity for the Northern and Western Region on a par with the other regions through the National Planning Framework is critical. **Monaghan County Council considers that the draft framework does not provide sufficiently clear direction to deliver upon this value, particularly for the Northern and Western Region and would request that measures to deliver upon 'Opportunity' are clearly outlined within the final version of the National Planning Framework.**
- 2.3 It is noted in Section 2.2 of Chapter 2 that policies to facilitate more inclusive and integrated growth broadly throughout Ireland are advocated. The location of the five designated cities in the National Planning Framework and the focus placed upon them for significant growth means that a more spatially uneven pattern of regional development will continue with the urban centres in the southern and eastern regions of the country developing ahead of the towns located in the border region (ie northwest of Dublin and Galway). The counties of Monaghan, Cavan, Leitrim, Sligo and Donegal have historically suffered economically and socially given their peripheral location from the remainder of the country, their proximity to the Northern Ireland border, and through a lack of investment in essential infrastructure in the past. These counties are on 'the periphery of the

periphery of Europe’ and it is likely that these counties will be further marginalised following the UK exit from the EU due to their location along the Northern Ireland border. It is considered that low levels of infrastructural investment over the years and limited incentives to retain and increase population numbers in the Northern and Western Region, has resulted in and will continue to result in population stagnation, with all the associated negative impacts that flow from this scenario. The building of ‘regional resilience’ is a key aspect of this, and may assist in the addressing the population loss to regions that are more prosperous. The inclusion of economic and infrastructural policies that are favourable to the Northern and Western Region are required within the National Planning Framework to address this under performance. **Monaghan County Council considers that ‘Positive Discrimination’ in favour of the Northern and Western Region, particularly the Border counties, is a necessary and explicit requirement of the National Planning Framework to redress the economic and population growth imbalances and to ensure that all regions in the State benefit fairly from the economic upturn and increased Government investment, and thus delivering more balanced development. Monaghan County Council would request that ‘Positive Discrimination’ measures in favour of the Northern and Western Region are incorporated within the final version of the National Planning Framework to achieve ‘Region Parity’.**

- 2.4 It is noted in Section 2.3 of Chapter 2 that population growth share for the Northern and Western Region is 16.7% of the targeted growth of the State and yet the Northern and Western Region’s current population share of the State’s population is 17.8%. If this share of targeted growth were pursued in the National Planning Framework it would result in a decline the share of the Northern and Western Region’s population of the State to 17.2% by 2040. This is contrary to the objective of strengthening the Northern and Western Region population base. In addition, these targets fail to take into account that there was a disproportionate decline in the population of the Northern and Western Region due to increased levels of emigration and relocation to other regions in search of employment. **Monaghan County Council considers that the National Planning Framework must adjust its targeted growth figures to ensure that not just the status quo is preserved, but also to ensure growth is accelerated in the Northern and Western Region to account for recent disproportionate declines during the economic downturn. Monaghan County Council would request that positive population growth measures are incorporated within the final version of the National Planning Framework to ensure the Northern and Western Region achieves ‘Region Parity’ with the other two regions.**

2.5 County Monaghan is placed equi-distant between the two largest urban centres on the island, Dublin and Belfast, and its geographical location presents both opportunities and obstacles to the future development of the county. The proximity of Monaghan to the Eastern Economic Corridor gives it an advantage in terms of economic development and connectivity, and provides markets as well as employment opportunities to its population. However, its border location, with one of the longest border boundaries, presents significant difficulties, such as restrictions on the normal functioning of the hinterlands of its towns, particularly as the four largest towns within the county are located on or within a few kilometres of the Border. Issues such as currency and taxation differences within the hinterlands of the towns in the county are significant barriers in the proper economic and social functioning of the county and the surrounding area. Despite its strategic location, along the axis between Letterkenny/Derry and Dublin and the axis between Belfast and Galway, County Monaghan has considerable inter-regional issues. Its place within the Northern and Western Regional Assembly (NWRA) is not reflective of the reality that it has stronger connections, synergies and similarities, economically and socially, with those counties in the Eastern and Midland Regional Assembly (Louth, Meath) and indeed the border Counties in Northern Ireland, than many in the NWRA (Galway, Mayo, Leitrim, Roscommon). Much of the economic activity taking place in Monaghan and Cavan is driven by their proximity to the large urban centres of the greater Belfast and Dublin areas, and the Eastern Economic Corridor, yet the National Planning Framework seeks to align the growth of these counties with the large urban centre of Galway. **Monaghan County Council considers that the draft National Planning Framework does not set out clearly how the border counties removed from the designated Northern and Western Region large urban centre of Galway will benefit from significant National Planning Framework policy decisions in favour of strengthening Galway. Monaghan County Council further considers that the National Planning Framework should acknowledge that the growth of counties such as Monaghan are intrinsically linked to their respective locations adjacent to the Eastern Economic Corridor and the Greater Dublin Area. Monaghan County Council would request that the final version of the National Planning Framework clearly acknowledges that the growth and development of counties such as Monaghan and Cavan is intrinsically linked to their respective locations adjacent to the Eastern Economic Corridor and the Greater Dublin Area.**

2.6 The Issues and Choices paper acknowledged that there are a number of towns which due to their level of service provision and extensive catchments, serve an important role for those areas that fall

outside the reach and influence of cities. Although many of these towns have been given the designation of large town within the draft National Planning Framework due to their population size, a number of these towns such as Monaghan, Roscommon and Carrick on Shannon, which are all county towns performing important functions to their surrounding hinterlands, fall below the identified population threshold of 10,000, and thus are diminished in terms of their status and function in the draft National Planning Framework. It is recognised in Section 3.3 of Chapter 3 of the draft National Planning Framework that there are few large towns in the Northern and Western Region as a whole. In Section 3.7 of Chapter 3 it is stated that “in addition to the five cities, there are opportunities for other urban areas and in particular well connected towns that are accessible to a significant population catchment and/or can offer a good quality of life, to accommodate population growth. Monaghan Town given its proximity to the large population centres between Belfast and Dublin, its location along the Derry Dublin axis, its proximity to the M1, and the quality of life it offers, would clearly fall within this categorisation. In addition, when Monaghan Town is assessed against the Hierarchy of Settlements and Related Infrastructure wheel on page 77 of the draft framework, it clearly fulfils the function of a large town providing facilities and services such as the County Court, the Garda District headquarters, Industrial Parks, Tourism Office, Major Roads (N2, N12 and N54), Bus Centre, Further Education and Special Schools, Outpatient Services and Minor Injuries Unit, Leisure Centre (pool), Museum and Arts & Culture Centre, Shopping Centre, Retail Warehousing and Range of Restaurants. If designated as a small town in the National Planning Framework, the population growth target is set at 15% as opposed to 40% for the large towns, which implications in terms of the continued growth of the town. Given that population growth will be aligned with investment through both the National Planning Framework and National Investment Plan, an acknowledgment of the important function provided by towns such as Monaghan needs to be explicitly stated in order to secure its role/importance and provide the town with the opportunity to develop and support the hinterland in the same way that the designated large towns do. With supported and co-ordinated development, Monaghan has the capacity to increase the benefits arising from its relationship with the Eastern Economic Corridor, Northern Ireland, and the Greater Dublin Area. Towns such as Monaghan need to be recognised nationally and their function in providing a key spatial and economic role in their area needs to be recognised, acknowledged and supported in the National Planning Framework so as to ensure that infrastructure and investment is channelled towards them, and so that their role serving the surrounding hinterland is reinforced and strengthened. There are concerns that these towns and the areas serviced by these towns will lag

behind other towns fulfilling similar roles if the main town in the area is not formally recognised and supported in the National Planning Framework. **Monaghan County Council considers that the National Planning Framework should designate towns which have a population of less than 10,000 but perform an important service role, such as Monaghan, as Principal/County Towns, and give them the same status as large towns to ensure a recognition and continuance of their importance, and more importantly their continued growth. Monaghan County Council would request that the definition of large towns in the final version of the National Planning Framework should be amended to “Large towns (>10,000 population or *identified principle county town*)”.**

2.7 It is noted in Section 3.5 of Chapter 3 that the targeted pattern of population growth to 2040 for Galway is in the range of 50-60% and that the targeted pattern of population growth for the large towns in the Northern and Western Region (Sligo, Letterkenny, Castlebar, Cavan, Ballina and including a portion of Athlone) to 2040 is 40%. This would result in a remaining balance of 50% of all targeted population growth being distributed between the remaining small towns, villages and rural area. This would result in extremely low targeted population growth allocation to the remaining small towns and villages of which there are many in the Northern and Western Region, given its lack of large urban centres and its dispersed population, notwithstanding the allocation to the rural area. **Monaghan County Council would request that the final version of the National Planning Framework takes account of the specific characteristics of the Northern and Western Region with its dispersed population spread over a significant number of small towns and villages in terms of setting population growth targets for the large towns and Galway City and the implications these targets would have on the growth of these smaller settlements.**

2.8 National Policy Objective 15 seeks to “Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacancy and deliver sustainable reuse and regeneration outcomes.” **Monaghan County Council considers that the National Planning Framework needs to provide more explicit clarity in how this will be delivered. Monaghan County Council would request that measures to achieve the reversal of rural decline are clearly outlined within the final version of the National Planning Framework and that specific funding for infrastructure provision to strengthen the capacity of small towns is committed to.**

2.9 National Policy Objective 17b to “Develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities, to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.” is strongly welcomed. The concept of the provision of serviced self build sites within zoned residential lands in urban areas is proposed to be incorporated within the draft Monaghan County Development Plan 2019-2025 (currently under preparation) as a means to providing an alternative to the demand for new detached dwellings in the rural area. It is hoped that this will assist in population retention in the urban centres within the county and encourage population growth in these urban centres. **Monaghan County Council fully supports this policy and would welcome the opportunity to participate in a pilot scheme as proposed in the National Planning Framework.**

2.10 The Sustainable Rural Housing Guidelines determines national policy in respect of rural housing and seeks to ensure that rural housing for rural dwellers is facilitated over the demand for urban generated rural housing. Although the National Planning Framework addresses rural housing in Section 4.4 of Chapter 4, it is considered that greater clarity is required in the exact thrust of National Policy Objective 18a which seeks to “Ensure, in providing for the development of rural housing that a distinction is made between areas under urban influence i.e. areas within the five city regions and the hinterland of towns, and elsewhere and that the standardised EU/OECD definition of a city region shall be applied to identify the urban influence of cities and large towns (>10,000), with influence of smaller (>10,000) towns determined locally.” It is further noted that National Policy Objective 18b states that “In rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area and relevant siting criteria for rural housing in statutory guidelines and plans.” **Monaghan County Council considers that greater clarity is required in respect of the thrust of National Policy Objective 18a, and that the social requirement for housing need, such as family ties, etc. should override any economic requirement in National Policy Objective 18b. Monaghan County Council would request that Objective 18a be amended to provide greater clarity as to the thrust of the objective and that National Policy Objective 18b be amended to incorporate ‘demonstrable social need’ in the final version of the National Planning Framework.**

2.11 In respect to Cross Border Local Initiatives under Section 7.3 of Chapter 7, it is considered that insufficient detail is provided on the delivery of this objective. **Monaghan County Council considers that more consideration should be given to the significance of the all island economy, the uniqueness of the Central Border Area and the challenges presented by the UK decision to leave the EU. It further considers that the National Planning Framework should specifically make reference to targeted investment that will counteract the consequences of the UK leaving the EU on the Border Region and specifically the Central Border Area. Monaghan County Council would request that the final version of the National Planning Framework should incorporate a number of scenario based outcomes in respect to the implications of the UK withdrawal from the EU upon the Central Border Area and the all island economy.**

2.12 The explicit mention of the N2/A5 Dublin to Derry route upgrade is welcomed and fully supported. **Monaghan County Council considers that greater clarity is required in terms of timescales for delivery of the N2/A5 Dublin to Derry route upgrade, given its importance in terms of connectivity to the North West and economic growth along this corridor, and the lack of direct rail infrastructure to the northwest. Monaghan County Council would request that explicit timescales for its delivery be referenced in the final version of the National Planning Framework. Furthermore Monaghan County Council considers that the N2/A5 Dublin to Derry route should be prioritised to full motorway standard given its strategic importance and the lack of any direct rail infrastructure serving significant urban areas the northwest along the route of the N2/A5, and would request that the extension of the motorway network to the north west be explicitly mentioned in the final version of the National Planning Framework.**

2.13 The explicit mention of the Ulster Canal Greenway is welcomed and fully supported. Monaghan County Council considers that mention of the reopening of the Ulster Canal should also be included in tandem with the development of the greenway given its tourism and economic potential for the Northern and Western Region, and its potential to act as a catalyst in the regeneration of a number of towns in the Central Border Area. **Monaghan County Council would request that any reference to the Ulster Canal Greenway also includes reference to the reopening of the Ulster Canal in the final version of the National Planning Framework.**

3.0 Comments by Elected Members

3.1 The draft National Planning Framework was discussed at the monthly meeting of Monaghan County Council on 6th November 2017 and the following comments by the elected members were recorded for inclusion with this submission:-

- An objective to provide a railway connection directly serving the northwest via County Monaghan should be specifically mentioned within the framework.
- Monaghan Town's status as a hub town under the National Spatial Strategy should be maintained under the National Planning Framework in recognition of its role and function as a county town and to ensure it continues to fulfil that role for its hinterland.
- Greater focus is required within the framework on the implications of the UK leaving the EU, particularly in respect of the Central Border Area and counties such as Monaghan.
- Specific mention of an objective to reopen the Ulster Canal should be made within the framework given its importance to tourism.
- Greater clarity is required within the framework in terms of addressing rural deprivation.
- It is considered that the document is aspirational with a lack of detail in the framework in terms of the delivery of objectives.
- Galway as the urban driver for the region gives rise to significant concern, given that Monaghan is at a remove from Galway and clearly orientated towards the greater Dublin Area and the Eastern Economic Corridor.
- Greater focus should be given to potential that the UK leaving the EU offers for places like Monaghan in terms of UK businesses locating there to ensure they have a continued presence in the EU.
- There should be a greater emphasis on rebates for installation of solar panels to ensure achievement of objectives in terms of carbon neutral electricity generation.

4.0 Conclusion

- 4.1 It is considered that the National Planning Framework is timely as Ireland emerges from economic recession, and concerns regarding climate change, impact of development upon the environment, rural depopulation and disparities in regional economic development require immediate attention.
- 4.2 Although there is recognition for more balanced growth or regional parity between Ireland's three regions within the framework, there remains concerns that the National Planning Framework does not explicitly direct how this will be achieved, particularly in respect of the Northern and Western Region, having regard to the disproportionate impact the recent economic downturn had upon the region and the implications that the UK leaving the EU will have on the Border Area.
- 4.3 The objectives to build up and strengthen existing urban areas is welcomed but requires more consideration in terms of the implications of this approach on smaller settlements and addressing rural decline. Of significant importance is the designation of Monaghan Town as a large town, having regard to its role and function to its surrounding hinterland and its potential for growth, given its location adjacent to the Eastern Economic Corridor and the Greater Dublin Area.